Tradeweb

2025 Australian Modern Slavery Statement
1 January 2025 – 31 December 2025

Disclaimer

Whilst Tradeweb has endeavoured to ensure the accuracy of the information contained in this document at the date of publication, it is general in nature and does not purport to be complete or error free. Any information in this document is subject to change without notice. Except as required by applicable regulations or law, Tradeweb is not under any obligations to review or update this document to reflect event or circumstances that arise after publication.

1 Reporting entities

This Australian Modern Slavery Statement is a joint statement prepared pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) by the following Tradeweb Group companies (together, the **Reporting Entities** or **Tradeweb**):

- Tradeweb Europe Limited (ARBN 631 529 836) (**Tradeweb Europe**);
- Tradeweb EU B.V. (ARBN 632 852 558) (**Tradeweb EU**); and
- TW SEF LLC (ARBN 639 195 887) (**TW SEF**),

for the **1 January 2025 to 31 December 2025** financial year (**Reporting Period**).

This joint Australian Modern Slavery Statement has been prepared for the purposes of compliance with the mandatory reporting criteria in the Act. References to "we", "us" and "our" are references to the Reporting Entities unless otherwise stated.

The Reporting Entities operate in an integrated manner within the broader Tradeweb Group, including through shared governance arrangements, centralised functions, and common policies and procedures, subject to applicable regional jurisdictional requirements.

2 Process of consultation with Reporting Entities

The Tradeweb Group adopts a collaborative and consistent approach to identifying and addressing modern slavery risks across its operations and supply chains. The oversight and coordination of the Reporting Entities' modern slavery response is managed collectively by the Tradeweb Group's Sustainability and Risk teams, and by the Legal and Compliance functions for the Reporting Entities.

This integrated governance model supports consistent implementation of policies and controls across the Reporting Entities.

In preparing this statement and prior to board approval, Tradeweb consulted with senior management and relevant internal stakeholders, including representatives from the Tradeweb Group's Sustainability and Risk teams, and the Legal and Procurement functions for each Reporting Entity, to ensure that the information presented reflects Tradeweb's modern slavery risk profile and response measures.

3 Structure, Operations and Supply Chain

3.1 Structure

Tradeweb Markets Inc., a Delaware registered company which is publicly listed in the United States, is the parent company of the Tradeweb group of companies (the **Tradeweb Group**). Tradeweb Markets Inc. is majority owned by entities affiliated with the London Stock Exchange Group plc.

As set out in section 1 of this Statement, Tradeweb Europe, Tradeweb EU and TW SEF are the only Reporting Entities as defined by s 5 of the Act within the Tradeweb Group.

Tradeweb Europe

- Tradeweb Europe Limited (ARBN 631 529 836) is a private limited company registered in England and Wales, and is authorised and regulated in:
    - (i) the UK by the Financial Conduct Authority as a UK investment firm with permissions to operate a Multilateral Trading Facility (**MTF**), Organised Trading Facility (**OTF**) and an Approved Publication Arrangement (**APA**);
    - (ii) Hong Kong by the Securities and Futures Commission as the provider of an Automated Trading Service;

- (iii) Singapore by the Monetary Authority of Singapore as a Recognised Market Operator, and
- (iv) is a holder of an overseas Australian Market Licence granted by the Australian Securities & Investments Commission (**ASIC**).

Tradeweb EU

- Tradeweb EU B.V. (ARBN 632 852 558) is a company registered in the Netherlands, and is regulated by the Dutch Authority for the Financial Markets as an investment firm with permissions to operate trading venues (an MTF, an OTF and an APA), and by the European Securities and Markets Authority for operating an APA. It is also a holder of an overseas Australian Market Licence granted by ASIC.

TW SEF

- TW SEF LLC (ARBN 639 195 887) is registered in the United States and regulated as a Swap Execution Facility by the Commodity Futures Trading Commission, and is the holder of an overseas Australian Market Licence granted by ASIC.

3.2 Operations

The Tradeweb Group is a global financial technology company specialising in the provision of electronic trading platforms to market participants on a global scale. The core business activities are consistent across the Reporting Entities. Tradeweb's electronic trading platforms facilitate trading across rates, credit, equities and money markets. Tradeweb services clients across the institutional, wholesale, retail and corporate treasury sectors.

Our locations

The Reporting Entities have physical offices and operational sites in the United Kingdom, United States, Hong Kong, Singapore, the Netherlands, France and Italy. Within the Tradeweb Group, there is a Global Capability Centre (**GCC**) located in India which provides support to the corporate business teams within the Tradeweb Group, including to the Reporting Entities.

Our workforce

The Reporting Entities collectively employ approximately 336 full-time employees and 81 contingent workers across the United Kingdom, Europe, Asia and the United States.

Our employees support Tradeweb's trading platforms, technology development, client services, and operational functions. Tradeweb's workforce is predominantly comprised of highly skilled professionals, with additional support provided by contingent workers where required.

3.3 Supply chain

The Tradeweb Group's supply chain consists of the procurement of a range of goods and services that support our global business operations. The Tradeweb Group also receives technology related services from service providers, such as data centre capabilities (which are outsourced) and system integration related services.

The Tradeweb Group's direct supply chain includes the sourcing of goods and services used to assist with the provision of electronic trading services and data products, and products and services that support our global operational and administrative requirements.

The procurement categories in the Tradeweb Group's direct supply chain include:

- office equipment and stationery;
- legal, accounting and other professional advisory services;
- IT equipment and technology-related services;
- marketing materials and associated marketing support;

- human resources services;
- financial and data services;
- catering services;
- property, facilities and occupancy costs; and
- travel and event services.

The Tradeweb Group engages approximately 2,100 active suppliers. The majority are located in the United States and the second largest group in the United Kingdom. The remaining active suppliers are based in North America, Europe, Asia-Pacific, South America, Africa and the Caribbean.

4 Risks of modern slavery in our operations and supply chain

Operations

Tradeweb is a service-based financial technology provider operating regulated electronic trading platforms and related technology and data services. Our business model is centred on the provision of institutional and wholesale financial market infrastructure and does not involve manufacturing, physical production, large-scale logistics, or labour-intensive field operations.

The Reporting Entities' workforce consists primarily of skilled full-time employees, supported by a small number of contingent workers. Our employees and long-term contractors are primarily professional staff, including technology, operations, compliance, risk management, legal, and market specialists, and are engaged under formal employment or services agreements and subject to robust labour and employment laws in the jurisdictions in which we operate.

None of the locations in which the Reporting Entities maintain physical and operational sites assessed to present a high-risk of modern slavery according to the Global Slavery Index.[1]

However, as mentioned in section 3 of this Statement, the Tradeweb Group's GCC is located in India, which is a jurisdiction identified as presenting a high-risk of modern slavery by the Global Slavery Index.[2] Whilst the nature of the GCC's services are professional, Tradeweb recognises there are inherent risks that modern slavery practices could occur in connection with direct employment arrangements, third-party labour providers, or ancillary services supporting the GCC (such as security, cleaning, catering or facilities management).

<u>Assessment of risk level</u>

Based on our operating model and workforce profile, Tradeweb has assessed the likelihood that it could cause or contribute to modern slavery through our direct operations to be generally low.

We recognise that potential modern slavery risks may arise indirectly through the use of certain third-party service providers, including contingent labour arrangements, facilities management services, and certain outsourced technology or support services. These risks are assessed through our enterprise risk management and third-party risk management processes.

Supply chain

Tradeweb recognises that its largest exposure to modern slavery risk arises through its supply chain. While the Tradeweb Group's procurement categories are generally relatively low-risk, certain goods and services procured to support its operations may be *directly linked* to higher-risk geographies, sectors or workforce types.

The following categories of suppliers in the Tradeweb Group's supply chain are known to have an elevated risk of modern slavery due to reliance on multi-tiered supply chains, manufacturing in higher-risk countries, or the use of migrant or low-skilled labour:

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1 Walk Free, Global Slavery Index (2023).

2 Walk Free, Modern Slavery in India (2023).

- IT hardware procurement, which may involve global electronics supply chains;
- facilities-related services such as cleaning, security, and building management;
- use of contingent labour and certain outsourced professional or technology support services, which may involve subcontracting arrangements; and
- procurement of marketing merchandise, office equipment and stationary, which may involve global supply chains.

The Tradeweb Group has suppliers located in 29 jurisdictions globally, with six being in high-risk jurisdictions (Saudi Arabia, India, UAE, Mexico, China, Brazil).

We recognise that certain upstream supply chains and labour-hire services may present inherent risk in some regions and consider these factors within our supplier due diligence and risk assessment processes.

Assessment of risk level

As a financial markets infrastructure provider, our supply chain is relatively concentrated in technology, professional services and regulated financial services sectors. Based on the nature of our activities and counterparties, we generally assess the risk of being directly linked to modern slavery through these relationships to be lower.

However, we recognise that modern slavery risk can arise in complex global supply chains and subcontracting arrangements. Accordingly, we incorporate consideration of broader environmental, social and governance risk factors into our third-party oversight processes, particularly for critical or higher-risk service providers.

Tradeweb is not aware of any current business relationships that have been identified as presenting a material modern slavery concern during the Reporting Period. We continue to monitor developments through our risk management, compliance and internal audit functions.

5 Actions taken to assess and address risks of modern slavery

To mitigate the risks of modern slavery, Tradeweb maintains centralised risk management frameworks, internal governance processes and procurement controls designed to minimise exposure to risks in its operations and supply chain, and to support compliance with its internal policies and legal obligations.

These frameworks and controls are established and overseen by the Reporting Entities' parent company, Tradeweb Markets Inc. (which is not a reporting entity under the Act) and apply across the Tradeweb Group, including to the Reporting Entities.

During the Reporting Period, modern slavery risk was addressed through Tradeweb's broader enterprise risk management and third-party risk management frameworks.

As a regulated financial markets infrastructure provider, our processes are risk-based and proportionate to the nature of our operations and supply chain.

Operations

Actions taken to address the risks of modern slavery in Tradeweb's operations during the Reporting Period included:

- compliance with all applicable labour and employment laws across the jurisdictions in which we operate;
- conducting employee training and awareness programs, including training on our Code of Conduct, which reinforces expectations relating to ethical conduct and compliance with applicable labour and human rights laws;
- oversight through enterprise risk management processes; and

- maintaining a formal whistleblowing policy enabling confidential reporting of suspected misconduct.

Supply chain

Actions taken to address the risks of modern slavery in Tradeweb's supply chain during the Reporting Period included:

- risk-based due diligence during vendor onboarding (considering the nature of services provided, geographic footprint and, where relevant, subcontracting arrangements);
- contractual review process led by the applicable Legal team for each Reporting Entity, inclusion of contractual provisions in agreements which require suppliers to comply with applicable laws and regulations, including labour and employment laws;
- incorporation of Tradeweb's Code of Conduct expectations (or comparable standards) into supplier engagement processes;
- periodic risk-based assessments of critical and higher-risk vendors under Tradeweb's third-party risk management framework;
- information security, operational resilience and compliance reviews for certain service providers, which may also consider broader environmental, social and governance risk factors; and
- ongoing monitoring of certain supplier relationships through enterprise risk oversight processes.

Third party risk-management program

Tradeweb maintains direct contractual relationships with its tier one suppliers and service providers. As a result, we have visibility at the first-tier level through our procurement, legal, compliance and risk management processes.

Our third-party risk management frameworks and procurement onboarding processes include risk-based due diligence and periodic review processes for critical and higher-risk vendors. These processes may include an assessment of operational resilience, information security, regulatory compliance and other relevant risk factors, including human rights considerations where appropriate.

The Tradeweb Group operates a documented, risk-based Third Party Risk Management Program covering onboarding, oversight and monitoring of its vendors.

The Program requires all vendors to be onboarded through a centralised procurement platform, which includes standardised due diligence questionnaires about the vendors governance and regulatory compliance, information security, sustainability and modern slavery.

Vendors are risk-rated based on service criticality, data access, regulatory exposure and geographic footprint. Critical vendors undergo formal annual reviews, and high-risk vendors are subject to enhanced monitoring. Where a supplier is identified as high-risk, mitigation steps may include increased due diligence, contractual reinforcement, escalation to one or more of Tradeweb's Risk, Compliance or Legal teams, increased monitoring, or seeking remediation requirements.

Governance framework

The Tradeweb Group maintains a suite of policies and procedures that apply to all Tradeweb subsidiaries that support ethical business conduct and the management of human rights-related risks, including modern slavery risk, across its operations and supply chain. These include:

- Code of Business Conduct & Ethics
- Anti-Corruption Policy
- Whistleblowing Policy

- Corporate Sustainability Report

These documents are updated and reviewed annually, and collectively establish expectations regarding lawful conduct, ethical business practices and compliance with applicable labour, employment and human rights laws.

6 Assessing effectiveness

In accordance with Tradeweb's risk-based approach, the oversight of the modern slavery response was undertaken through Tradeweb's existing governance, risk management and compliance processes.

These broader frameworks provide continuous oversight of third-party risk, procurement practices, compliance with organisational policies, and supplier onboarding and review processes. The processes support visibility over Tradeweb's compliance with applicable laws and internal policies and procedures, and are capable of identifying and escalating potential modern slavery risk where it arises.

During the Reporting Period, Tradeweb have not identified any confirmed incidents of modern slavery within our controlled operations, nor have we received any substantiated modern slavery-related complaints through our internal reporting mechanisms.

Tradeweb recognises that assessing the effectiveness of actions is an important component of a modern slavery risk management framework.

During this Reporting Period, Tradeweb has undertaken a structured assessment of its modern slavery risk management approach. Throughout this process, Tradeweb has identified areas for further development and opportunities to strengthen its response, and in future reporting periods, Tradeweb intends to enhance its monitoring and evaluation processes, including through the potential development of appropriate indicators, review mechanisms and reporting metrics proportionate to the nature and scale of its operations and supply chain.

7 Approval and signature

This joint Australian Modern Slavery Statement is made by the Reporting Entities (Tradeweb Europe Limited, Tradeweb EU B.V and TW SEF LLC) pursuant to section 14 of the Act, and has been prepared in consultation with each Reporting Entity as described in Section 2.

This joint Australian Modern Slavery Statement was approved by the Boards of each of the Reporting Entities. The board of Tradeweb Europe Limited approved this statement on 22 May 2026. The board of Tradeweb EU B.V approved this statement on 18 May 2026. The board of TW SEF LLC approved this statement on 29 May 2026.

*This statement is signed by **Douglas Friedman** in his role as Director of **Tradeweb Europe Limited**, a responsible member of its board, being the principal governing body of Tradeweb Europe Limited.*

Signature:

DocuSigned by:
Doug Friedman
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Douglas Friedman
***Director** of Tradeweb Europe Limited*
Date: June 3, 2026

This statement is signed by ***Ramses Trogh*** *in his role as Director of* ***Tradeweb EU B.V.****, a responsible member of its board, being the principal governing body of Tradeweb EU B.V.*

Signature:

Signed by:

Ramses Trogh

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Ramses Trogh

Director of *Tradeweb EU B.V.*

Date: June 4, 2026

This statement is signed by ***Douglas Friedman*** *in his role as Director/Manager* ***of TW SEF LLC****, a responsible member of its board, being the principal governing body of TW SEF LLC.*

Signature:

DocuSigned by:

Doug Friedman

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Douglas Friedman

Director/Manager *of TW SEF LLC.*

Date: June 3, 2026

Table 1 below identifies where each criterion of the Act is disclosed within sections of this Statement.

***Table 1** Mandatory criteria*

MANDATORY CRITERION	SECTION IN STATEMENT	PAGE
1. Identify the reporting entities	Section 1	3
2. Describe the process of consultation as between the joint reporting entities	Section 2	3
3. Describe the reporting entities' structure, operations and supply chains	Section 3	3-5
4. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities and any entities they own or control	Section 4	5-6
5. Describe the actions taken to assess and address those risks, including due diligence and remediation processes	Section 5	6-8
6. Describe how the reporting entities assess the effectiveness of such actions	Section 6	8